



Richard T. Ellis
Director – Federal Affairs

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2534
(202) 336-7866 (fax)

February 27, 2002

Ex Parte

William Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: Application by Verizon New England for Authorization To Provide In-Region,
InterLATA Services in Vermont, CC Docket No. 02-7*

Dear Mr. Caton:

This letter responds to Staff's requests for additional information concerning certain OSS enhancements related to offering resold DSL on resold voice lines (DRL).

As the Commission recognized in its Order approving Verizon's long distance application for Connecticut, Verizon had a manual ordering process in place at that time to begin taking orders for resold DSL over resold voice lines (DRL). Since then, Verizon has implemented a number of enhancements to its "core" OSS and to VADI's OSS to enable the ordering and provisioning systems to handle DRL orders. Attachment 1 to this letter is a chart setting out the enhancements that have been implemented through the end of 2001. Despite these enhancements, in the former Bell Atlantic states where VADI operated, no reseller has submitted orders – other than test orders – to Verizon for DRL service. (In Pennsylvania, where Verizon conducted the test of DRL, the participating reseller submitted only 6 test orders that were intended to complete the entire provisioning process. Verizon successfully completed these orders.)

The Commission's Connecticut Order indicated a number of areas that it expected Verizon to address as permanent order processing procedures were implemented. First, the Commission stated that it expected permanent order processing procedures to eliminate the need to establish the reseller as the voice provider on the line before Verizon could process the DSL resale order. Verizon's order processing procedures are continuing to evolve. When voice and data are

established on a single line, however, the voice provider controls the line, and the data provider is a sub-tenant. As a result, the voice service must be established first. This is true whether Verizon, a CLEC, or a reseller is the voice provider.

Moreover, as the tariff makes clear, the reseller of DSL must have a relationship with an ISP. When an end user's DSL service is established, that end user's service is mapped through the Advanced Data Network over a pre-established route, unique to each ISP, out to the serving ISP's POP (Point Of Presence or Router). If the end user moves from VADI to a reseller for its DSL service, the ISP relationship likely will change, even though the underlying DSL service is still provided by VADI. Therefore, VADI must re-route the service so the end user can reach the new ISP. This re-routing means that the resale of DSL is more complex than the relatively simple migration of voice service to a reseller, and prevents the simple "flip" of the voice and DSL "package" from Verizon to a reseller.

The Commission also stated that it expected permanent order processing procedures to eliminate the need to (temporarily) disconnect resold DSL if the end user switches from the reseller back to Verizon for the underlying voice service. Since Verizon has not received any production DRL orders, there are no lines in place with resold DSL and resold voice in any former Bell Atlantic state where VADI operated. As a result, Verizon has not received any orders where an end user seeks to switch its voice service back to Verizon while retaining the reseller providing DSL. Nevertheless, if such an order were received, Verizon would endeavor to complete the order without disconnection of the DSL service.

Finally, the Commission stated its expectation that Verizon's performance in providing DRL would ultimately be reflected in its performance data. As Attachment 1 makes clear, Verizon has implemented enhancements in its systems to allow it to capture performance data for DRL service. The subject of performance measures covering the resale of xDSL after Verizon's separate data affiliate is reintegrated has been a topic of discussion in the Carrier-to-Carrier Working Group in New York. To date, however, no performance measures specific to DRL have been developed in the state collaboratives.

The twenty-page limit does not apply as set forth in DA 02-111. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Telli". The signature is fluid and cursive, with the first name "Richard" and last name "Telli" clearly distinguishable.

cc: J. Veach
J. Stanley
G. Remondino

**Implementation of OSS Enhancements to Support
DSL over Resold Lines – DRL – in former Bell Atlantic**

Date	Description	Jurisdiction
July 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	CT
August 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	PA DE DC MD VA WV
August 2001	Enhance VADI's OSS to generate a unique PON# for identification of LSRs for work flow and reporting	All
September 2001	Enhance VADI's reporting system to provide order status reporting to Resellers	All
October 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	MA ME NH NY RI VT
October 2001	Enhance VADI's Provisioning OSS to capture Reseller ID for Metric Reporting	All
November 2001	Enhance VADI's Maintenance Database to capture Reseller ID for Metric Reporting	All